

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

FILED
RICHARD W. NAGEL
CLERK OF COURT

2021 MAY -4 PM 3:50

UNITED STATES OF AMERICA,

Plaintiff,

v.

EBONY WHEAT,

Defendant.

CASE NO.

JUDGE

BILL OF INFORMATION

18 U.S.C. § 666(a)(1)(A)

FORFEITURE

THE UNITED STATES ATTORNEY CHARGES:

BACKGROUND

1. From on or about November 28, 2016, through on or about November 29, 2019, the defendant, **EBONY WHEAT**, was an employee and agent of Community Shelter Board (CSB).

2. At all times relevant to this Information, CSB was a charitable organization located in the Southern District of Ohio. As part of its mission to alleviate and prevent homelessness, CSB provided rent assistance to certain individuals experiencing homelessness. These individuals applied to CSB for assistance, and, once CSB determined their eligibility, CSB made direct rent payments on their behalf to landlords or property managers.

3. In each of 2017, 2018, and 2019, CSB received millions of dollars of Federal benefits from the U.S. Department of Housing and Urban Development.

4. As an employee and agent of CSB, **WHEAT** participated in the process of reviewing and qualifying applicants for direct rent assistance and ensuring that payments were made to landlords and property managers.

5. From on or about August 4, 2017, through on or about November 27, 2019, **WHEAT** used her position at CSB to falsify applications for direct rent assistance and thereby cause CSB to issue approximately 172 fraudulent checks, totaling approximately \$352,769, to her acquaintances, who were neither landlords nor property managers, and who did not provide services to CSB's clients experiencing homelessness.

6. At times relevant to this Information, **WHEAT's** acquaintances accepted the fraudulent checks from CSB and gave her part of the proceeds.

COUNT 1
(Federal Program Theft–2017)

7. Paragraphs 1 through 6 are incorporated here.

8. From on or about August 4, 2017, to on or about December 22, 2017, in the Southern District of Ohio, the defendant, **EBONY WHEAT**, an agent of CSB—an organization receiving in the one year period beginning January 1, 2017, benefits in excess of \$10,000 under a Federal grant program—did steal, embezzle, obtain by fraud, and intentionally misapply property worth at least \$5,000 and owned by, and under the care, custody, and control of CSB, that is, money paid by fraudulent check, in violation of 18 U.S.C. § 666(a)(1)(A).

COUNT 2
(Federal Program Theft–2018)

9. Paragraphs 1 through 6 are incorporated here.

10. From on or about January 5, 2018, to on or about December 21, 2018, in the Southern District of Ohio, the defendant, **EBONY WHEAT**, an agent of CSB—an organization receiving in the one year period beginning January 1, 2018, benefits in excess of \$10,000 under a Federal grant program—did steal, embezzle, obtain by fraud, and intentionally misapply property worth at least \$5,000 and owned by, and under the care, custody, and control of CSB, that is, money paid by fraudulent check, in violation of 18 U.S.C. § 666(a)(1)(A).

COUNT 3
(Federal Program Theft–2019)

11. Paragraphs 1 through 6 are incorporated here.

12. From on or about January 3, 2019, to on or about November 27, 2019, in the Southern District of Ohio, the defendant, **EBONY WHEAT**, an agent of CSB—an organization receiving in the one year period beginning January 1, 2019, benefits in excess of \$10,000 under a Federal grant program— did steal, embezzle, obtain by fraud, and intentionally misapply property worth at least \$5,000 and owned by, and under the care, custody, and control of CSB, that is, money paid by fraudulent check, in violation of 18 U.S.C. § 666(a)(1)(A).

FORFEITURE

13. The allegations contained in this Information are incorporated here for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

14. Upon conviction of any offense alleged in Counts 1, 2, and 3 of this Information in violation of Title 18, United States Code, Section 666(a)(1)(A) (Federal Program Theft), the defendant, **EBONY WHEAT**, shall forfeit to the United States, in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, constituting or derived from proceeds traceable to such violation,

including, but not limited to, a sum of money equal to the amount of proceeds WHEAT obtained as a result of such offense.

Forfeiture in accordance with Title 18, United States Code, Section 981(a)(1)(C), Title 28, United States Code, Section 2461(c), and Rule 32.2 of the Federal Rules of Criminal Procedure.

**VIPAL J. PATEL
ACTING UNITED STATES ATTORNEY**



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